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REC'D TN
REGULATORY AUTH.

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OFFICE OF THE
EXECUTIVE SECRETARY

RECEIVED
ADMINISTRATIVE

MAY 04 1999

TN REGULATORY AUTHORITY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

99-00336

JA

Re: Citizens Telecommunications Company- Petition for Approval of an IntraLATA
Toll Dialing Parity Implementation Plan

Dear Mr. Waddell:

Enclosed herewith are the original and 14 copies of Citizens Telecommunications Company's petition for approval of an intraLATA toll dialing parity implementation plan. A check in the amount of \$25.00 for the prescribed filing fee is also enclosed.

Citizens Telecommunications Company is an affiliate of the two Citizens incumbent local exchange carriers in the State. It provides long distance services and holds an authorization to also provide local exchange services. It provides no local exchange services at present.

An addition copy of this filing is included for date stamping and return in the enclosed, self-addressed and postage prepaid return envelope.

Yours very truly,

A handwritten signature in black ink, appearing to read "RM Tettelbaum", with a stylized flourish at the end.

Richard M. Tettelbaum

cc (w/encl.)
Angelo Rella
J. Michael Swatts

check 25.00
130274.00

ORIGINAL

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Docket No. 99-

00336

REC'D TN
REGULATORY AUTH.

'99 MAY 6 AM 9 46

In re:

Petition of Citizens Telecommunications Company for Approval of an IntraLATA
Toll Dialing Parity Implementation Plan

OFFICE OF THE
EXECUTIVE SECRETARY

PETITION

Citizens Telecommunications Company, by its attorney, files its Petition seeking the approval of the Tennessee Regulatory Authority (the "TRA" or "Authority") of its intraLATA toll dialing parity implementation plan, and respectfully shows as follows:

1. Citizens Telecommunications Company ("CTC") is an interexchange carrier providing intrastate, interstate and international telecommunications services. It also holds certification to provide competitive local exchange and interexchange services within the State of Tennessee.

2. CTC originally secured competitive local exchange authority from the TRA in order to resell the local services of BellSouth. However, operations were never commenced and CTC has no local exchange customers.

3. This Petition is filed pursuant to the FCC's Rules and contains CTC's proposed plan for implementation of intraLATA equal access. The company is not seeking intraLATA equal access cost recovery.

4. CTC, as a local reseller, will, before serving customers, advise each customer of the necessity to select long distance carriers, particularly for intraLATA traffic. Any customer that fails to select an intraLATA interexchange carrier will be blocked from placing intraLATA long distance calls. Assuming that the underlying Incumbent Local Exchange Carrier ("ILEC")

whose services are being resold provides intraLATA equal access, CTC resale customers, if any, will have intraLATA equal access services available upon the commencement of their business relationship with CTC. The available interexchange carriers will be those available to customers of the underlying ILEC whose services are being resold.

5. CTC has no plans at this time to become a facilities-based local exchange carrier. If it decides to do so at some point in the future, it will file an intraLATA presubscription plan for TRA approval no less than four months before the commencement of service. That plan would propose, as its sole implementation feature, that interexchange carriers will be notified of the opportunity to offer services to CTC customers on an equal access basis when CTC commences facilities-based operations.

6. Consistent with the FCC's requirements and the capability of the underlying ILEC whose services are being resold, CTC's intraLATA equal access deployment will feature "full 2-PIC" capability, *i.e.*, arrangements that allow end users to presubscribe to one carrier for all interLATA toll calls and to presubscribe to the same or another carriers for all intraLATA toll calls.

7. For the purpose of toll dialing parity, all CTC end offices will be associated with the LATAs of underlying ILECs whose services are being resold.

8. End users will be assessed a cost-based PIC change charge per CTC's tariff for changing their intraLATA carrier. When end users request a change in their intra- and inter-LATA carriers during one contact with CTC and choose the same carrier for both jurisdictions, only one charge will be assessed. When end users request a change in their intra- and inter-LATA carriers during one contact with CTC and choose different carriers for each jurisdiction, separate intra- and inter- LATA PIC change charges will be assessed.

9. CTC, if it commences operations, will establish a charge for "slamming" or unauthorized PIC changes submitted by any carrier for unauthorized PIC changes

10. CTC, if it commences operations, will comply with Section 51.217 of the Rules of the Federal Communications Commission ("FCC") governing nondiscriminatory access to, *inter alia*, operator services, directory assistance services and directory listings, to the extent that it provides such services to itself. If CTC secures such services from other parties, it will arrange, upon request, for those parties to provide those services to a requesting party.

11. CTC will comply with Sections 51.305, 307, 325, 327, 329, 331, 333 and 335 of the FCC's Rules governing network information practices.

12. CTC will comply with all orders and regulations of the Federal Communications Commission and the TRA pertaining to payphone presubscription.

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS
COMPANY

By:



Richard M. Tettelbaum, Associate General
Counsel

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May 3, 1999